

EXHIBIT C**DECLARATION OF DR. LEIGH M. JOHNSON**

28 U.S.C. § 1746 – Unsworn Statement

I, Dr. Leigh M. Johnson, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am the plaintiff in Johnson v. Christian Brothers University, Case No. 2:25-cv-02618-MSN-atc. I make this declaration in support of my Response in Opposition to Defendant's Motion to Set Aside Clerk's Entry of Default.

2. On 20 June 2025 I prepared Certified-Mail Receipt No. 7021 2720 0001 2345 6789 and PS Form 3811. I addressed the envelope exactly as follows:

Christian Brothers University
c/o Ron L. Brandon, Registered Agent
650 E. Parkway South
Memphis, TN 38104

3. I handed the package with summons and complaint to a USPS agent at the U.S. Post Office, 1325 Autumn Ave, Memphis, TN on June 18 2025. The clerk accepted the package and payment for Certified Mail Delivery-RRR.

4. USPS tracking shows delivery at 1:01 p.m. CDT on 20 June 2025. I downloaded the Proof-of-Delivery PDF reflecting the signature (NCF 10-1).

5. I received no communication from CBU until 25 July 2025. At 1:00 p.m. that day counsel Vescovo emailed me; I replied at 2:48 p.m. offering to stipulate to set aside the default if CBU answered within seven days. Counsel never responded.

6. I remain ready to perfect personal service within seven days if directed, but I believe my 20 June 2025 service complied with Fed. R. Civ. P. 4(h)(1)(A) and Tenn. R. Civ. P. 4.04(10).

Executed on 27 July 2025, at Washington, D.C.

/s/ Leigh M. Johnson
Dr. Leigh M. Johnson

Pro Se Plaintiff

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Dated: July 28 2025